

REPLY TO MONTCLAIR OFFICE

November 30, 2018

Filed via ECF

Hon. Kimba M. Wood, U.S.D.J.
Moynihan United States Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: United States v. Juxhin Uli,
17-cr-00641(KMW)

Dear Judge Wood:

This letter-motion is respectfully submitted to request an order extending, by 30 days, the date for Mr. Uli to surrender to begin service of the 90-day sentence imposed by Your Honor on November 1, 2018. The Government has advised that it takes no position on the application.

Mr. Uli has been informed by Pretrial Services that he must report to the designated facility, the Metropolitan Correctional Center, on December 13, 2018. This letter-motion, if granted, would extend that date to Monday, January 14, 2019.

As Your Honor may recall from sentencing, Mr. Uli has extensive family responsibilities, including aging parents, teen-aged children, and a very young son. The primary motivation for this request is his and his family's wish to be together for the upcoming holidays. The family is also active in the Roman Catholic faith and religion plays a role in the request as well. Finally, Mr. Uli has recently opened a new business venture, a restaurant, and the holiday season promises to be particularly busy.

Mr. Uli has been on release for the entire period of this prosecution and has scrupulously honored his bail conditions. There is no suggestion he is a flight risk or that he presents any danger to the community.

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Your Honor's attention to this matter is appreciated. Please advise if the Court has any questions or concerns.

Respectfully submitted,

/s/ David A. Ruhnke

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Copy via ECF: Drew Skinner, A.U.S.A.